

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF NORTH DAKOTA

In re:	)	Case No. 24-30422
	)	(Chapter 11)
JAMIESON CAPEX FUND, LLC	)	
	)	
Reorganized Debtor.	)	
_____	)	

**MOTION TO CONTINUE HEARING ON  
FIRST AND FINAL APPLICATION OF JAMIESON CAPEX FUND, LLC  
FOR ALLOWANCE OF COMPENSATION OF CHIEF RESTRUCTURING OFFICER**

Comes now Jamieson CAPEX Fund, LLC (“CAPEX” or the “Reorganized Debtor”), by and through undersigned counsel, pursuant to Local Rule 5071-1, and moves for a continuance (or, more precisely, re-scheduling) of the hearing on the First and Final Application of Jamieson CAPEX Fund, LLC for Allowance of Compensation of Chief Restructuring Officer (the “Application,” as found at DE #110), and in support thereof states as follows:

This Honorable Court has scheduled a hearing on the Application for May 29, 2025 at 2:00 pm. *See* Notice of Hearing, DE #112. Unfortunately, undersigned counsel is currently scheduled to be in a full day trial in Maryland on May 29, 2025, with the Reorganized Debtor’s co-counsel, Christianna Cathcart, being slated to also attend the same trial.

In light of the Subchapter V trustee’s opposition to the Application, DE #111, the Dakota Bankruptcy Firm’s reply thereto, DE #113, and the Reorganized Debtor’s joinder in that reply, DE #114, it is reasonably anticipated the hearing on the Application will be substantive in nature. The Reorganized Debtor’s counsel strongly wishes to attend the hearing but also believes it would be impractical to seek a continuance of the trial in Maryland (which has already been continued once prior and which will involve the testimony of at least three witnesses).

While this motion titularly seeks a “continuance,” CAPEX really only seeks a change of the hearing date, whether moved up or continued to a later date. Counsel for CAPEX is presently

available on April 28-30, May 5, 9, 15-16, 21, 22 (after 11:00 am), 23, 26 and 27, as well as June 5-7, 9-12, and 17-20.

WHEREFORE, CAPEX respectfully prays this Honorable Court reschedule the hearing on the Application, and for such other and further relief as may be just and proper.

Respectfully submitted,

Dated: April 19, 2025

By: /s/ Maurice B. VerStandig  
Maurice B. VerStandig, Esq.  
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*Counsel for the Reorganized Debtor*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 19th day of April, 2025, a copy of the foregoing was served electronically upon filing via the ECF system.

/s/ Maurice B. VerStandig  
Maurice B. VerStandig